ANNUAL 47 C.F.R. §64.2009(E) CPNI CERTIFICATION

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for 2011, which is due March 1, 2012.

Date Filed: 1/27/2012

Name of company covered by this certification: Peace Valley Telephone Co., Inc.

Form 499 Filer ID: 802071

Name of signatory: Kelly Michael Bosserman

Title of signatory: Vice President of Regulatory Affairs

I, Kelly Michael Bosserman, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq*.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

See attachment.

The company has not taken any actions(proceedings instituted or petitions filed by a company at either state commission, the court system, or at the Commission against data brokers) against data brokers in the past year. We understand that Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI and we have incorporated the steps we are taking with the statement explaining how our company's procedures ensure our compliance.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category of complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information). None.

Signed_/s/ Kelly Michael Bosserman

Kelly Michael Bosserman, Vice-President of Reg. Affairs, Peace Valley Telephone Co., Inc.

<u>Peace Valley Telephone Co., Inc.'s accompanying statement explaining how the company's procedures ensure that the company is in compliance with FCC CPNI requirements.</u>

Peace Valley Telephone Co., does not use CPNI for marketing purposes. Accordingly, Peace Valley Telephone Co.'s personnel are trained not to use CPNI for such purposes. Because CPNI is not used for marketing purposes, Peace Valley Telephone Co. has established the appropriate safeguards for this type of treatment (non-use) of CPNI data. These safeguards include documentation of this policy in company procedures and training of company personnel with regard to non-use of CPNI data.

The company has sent employees to seminar training on CPNI compliance and then trained other employees on the same material and information obtained at said seminars including but not limited to what information may be discussed as Routine Carrier-Customer Service and Billing Relations, given information provided by customer to the employee.

Employees are instructed to protect CPNI from pretexters and the like, by obtaining passwords from our customers and requiring those passwords before releasing CPNI. Customers are informed not to use social security numbers, birthdays, mother's maiden name or any other common identity form. Our employees are also instructed to use call back numbers and/ or written responses which are sent to the numbers given by our customers and the addresses given by our customers as addresses to send correspondence on CPNI. These numbers and addresses and passwords are originally obtained by verification of the party who is providing the information by using proper methods of authenticating, whether by picture i.d., main telephone number call back and/ or main billing address letter.

Employees are instructed to notify the customers immediately when certain account changes are made, such as but not limited to: password; customer back-up means for lost or forgotten password; online account-n/a; or address of record. We do not have online account accessibility.

Employees are instructed to notify law enforcement, customers and the FCC and the MOPSC in the event of a CPNI breach.

Our employees are instructed to obtain explicit consent from a customer before disclosing a customer's CPNI to a carrier's joint venture partners or independent contractors for the purposes of marketing communications-related services to that customer; however, our company does not release information for marketing purposes to anyone.

Employees are instructed to keep records of any CPNI breach for at least two years.

The company secures its network.

Our Company sends an annual notice out to our customers regarding their privacy rights over their CPNI and whether they do not desire to receive any information on products and/ or services provided by our company or any of its d/b/a's or affiliates.

Any outside billing agency has been instructed to not release any CPNI that they may receive during the course of their functions for us.

The importance of CPNI protection is frequently brought up during the course of a year.